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INTERVENTION

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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION OF
THE ARIZONA ELECTRIC DIVISION OF
CITIZENS COMMUNICATIONS COMPANY
TO CHANGE THE CURRENT PURCHASED
POWER AND FUEL ADJUSTMENT CLAUSE
RATE, TO ESTABLISH A NEW PURCHASED
POWER AND FUEL ADJUSTMENT CLAUSE
BANK, AND TO REQUEST APPROVED
GUIDELINE FOR THE RECOVERY OF COSTS
INCURRED IN CONNECTION WITH ENERGY
RISK MANAGEMENT INITIATIVES

DOCKET NO. E-01032C-00-0751

MOTION TO INTERVENE

Arizona Corporation Commission

DOCKETED

NOV 21 2000

Mohave County, Arizona, as authorized by its Board of Supervisors, hereby moves the
Corporation Commission to grant Mohave County leave to intervene in the above-captioned
proceeding, pursuant to A.A.C. R14-3-105. In support hereof, Mohave County states as follows:

1. Citizens Utilities Company's certificated service territory includes geographic
areas located within Mohave County, Citizens uses rights-of-way granted by Mohave County,
and Citizens provides electric service to Mohave County and many of its residents and
businesses.

2. Mohave County is directly and substantially affected by Citizens' proposed cost
recovery and associated rate adjustments, and Mohave County can best represent its own
interests in this proceeding.

3. Mohave County's participation in this proceeding will not unduly broaden the
nature or scope of this proceeding. Mohave County, like the Commission, desires to determine
whether Citizens' recovery proposal is in the public interest.

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1 4. Service of all correspondence, documents or pleadings should be made to counsel
2 for Mohave County as follows:

3
4 Christine L. Nelson,
5 Deputy County Attorney
6 P.O. Box 7000
Kingman, AZ 86402-7000
(520) 753-0770

7 For the foregoing reasons, Mohave County respectfully requests that the Commission
8 issue its Order granting this Motion to Intervene.

9
10 RESPECTFULLY SUBMITTED this 16th day of November, 2000.

11 WILLIAM J. EKSTROM, JR.
12 MOHAVE COUNTY ATTORNEY

13 By: Christine L. Nelson
14 Christine L. Nelson,
15 Deputy County Attorney
16 P.O. Box 7000
Kingman, AZ 86402-7000
Attorneys for Mohave County

17 The original and ten copies of the
18 foregoing were filed by certified mail
19 this 16th day of November, 2000 to:

20 Director of Utilities
21 Arizona Corporation Commission
22 Docket Control Center
1200 West Washington Street
Phoenix, AZ 85007-2996

23 Copies of the foregoing mailed
24 this 16th day of November, 2000 to:

25 Carl Dabelstein
26 Citizens Utilities Company
27 2901 N. Central Avenue, Suite 1660
Phoenix, Arizona 85012

28 ///

1 Scott S. Wakefield, Chief Counsel
2 RUCO
3 2828 N. Central Avenue, Suite 1200
4 Phoenix, Arizona 85004

5 Walter W. Meek, President
6 Arizona Utility Investors Association
7 2100 N. Central Avenue, Suite 210
8 Phoenix, Arizona 85004

9 Lyn Farmer, Chief Counsel
10 Legal Division
11 ARIZONA CORPORATION COMMISSION
12 1200 West Washington Street
13 Phoenix, Arizona 85007

14 Deborah Scott, Director
15 Utilities Division
16 ARIZONA CORPORATION COMMISSION
17 1200 West Washington Street
18 Phoenix, Arizona 85007

19 By: 